



U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 2

May 24, 2019

BY ELECTRONIC MAIL

Robert Law, Ph.D.
de maximis, inc.
186 Center Street, Suite 290
Clinton, New Jersey 08809

Re: Re: Lower Passaic River Study Area Draft Remedial Investigation Report –
Administrative Settlement Agreement and Order on Consent for Remedial
Investigation/Feasibility Study (Agreement) CERCLA Docket No. 02-2007-2009

Dear Dr. Law:

The U.S. Environmental Protection Agency (EPA) has reviewed the *revised Remedial Investigation (RI) Report*, prepared by Anchor QEA on behalf of the Cooperating Parties Group (CPG) for the Lower Passaic River Study Area (LPRSA). Comments from partner agency New Jersey Department of Environmental Protection (NJDEP) were incorporated.

The evaluation focuses on a backcheck of prior comments, CPG responses, and revisions to the document and a general review of consistency and continuity within the document. Unless otherwise noted, the CPG's responses to prior comments and related revisions to the document are considered acceptable. The current evaluation documented herein excludes review of Section 9, the Baseline Ecological Risk Assessment (BERA) portion of Appendix D, and Appendix P (the Bioaccumulation Model appendix).

In accordance with Section X, Paragraph 44(d) of the Agreement, EPA has enclosed an evaluation of CPG's revised RI Report with this letter. Please proceed with revisions to the draft RI Report within 30 calendar days consistent with the enclosed comment evaluations. If there are any questions or clarifications needed on EPA's enclosed comment evaluations, please contact me to discuss.

Sincerely,

A handwritten signature in dark ink, appearing to read "Diane Salkie".

Diane Salkie, Remedial Project Manager
Lower Passaic River Study Area RI/FS

Enclosure

Cc: Zizila, F. (EPA)
Sivak, M. (EPA)
Hyatt, B. (CPG)
Potter, W. (CPG)

EPA COMMENTS

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No.	Section	General or Specific	Page No. *	Comment
<i>Executive Summary</i>				
1	Executive Summary ES.1	Specific	<i>ES-4</i>	In the sixth paragraph of Section ES.1, the fourth sentence indicates that even where net deposition has occurred on the timescale of decades, dynamic erosion and deposition likely “occurred” on short timescales. In reality, this dynamic erosion and deposition is likely ongoing. Revise this sentence to read “Even where net deposition has occurred on the scale of decades, dynamic erosion and deposition likely occurred and continues to occur on short timescales.” Also, in the first sentence of the final paragraph in Section ES.1, replace “contaminant” with “contaminants” (plural).
2	Executive Summary ES.2	Specific	<i>ES-6 to ES-7</i>	In the <i>Biota Contaminant Concentration Patterns</i> portion of Section ES.2, which was added in response to prior comment #15 on the Executive Summary (see the comments on the Executive Summary submitted by EPA on December 17, 2018), the sixth sentence of the first paragraph summarizes that HMW and LWM PAH concentrations are generally higher in benthic omnivores, and that concentration ranges for fish from the LPR overlap with concentration ranges for fish from above Dundee Dam. PAHs are not listed in Table 7-12 of the BERA, which compares LPR fish tissue results to background areas, including above Dundee Dam, and overall the BERA does not infer conclusions for PAHs based on comparison to background. Delete the portion of this sentence that references comparison of PAH concentrations in fish from the LPR to PAH concentrations in fish from above Dundee Dam to maintain consistency between the BERA and RI.
3	Executive Summary ES.2	Specific	<i>ES-8</i>	In the third paragraph of the <i>Natural Recovery</i> portion of Section ES.2, change “2010 levels” in the first sentence to “2010 surface sediment concentrations” to more clearly indicate what it is that is comparable to levels on recently deposited sediment. Also, in the second sentence of this paragraph, change “means” to “suggests” in order to avoid a definitive presupposition about this outcome.
4	Executive Summary ES.2	Specific	<i>ES-9</i>	In the fourth sentence of the first paragraph of the <i>Impact of Ongoing Sources</i> portion of Section ES.2, change “would not” to “may not” when describing the potential to achieve long-term reductions of other contaminants (i.e., other than 2,3,7,8-TCDD) to avoid a definitive presupposition about this outcome.
5	Executive Summary ES.3	General	<i>ES-10</i>	EPA provided a prior comment on the Executive Summary requesting that a brief overview of the human health and ecological risk assessment process and methodology be included (see prior comment #26 from the comments on the Executive Summary submitted by EPA on December 17, 2018), including COPCs/COPECs, receptors, and exposure pathways and the justification for these components of the assessments. Section ES.3 has been updated to include a summary of the BERA process and methodology, but an analogous summary for the BHHRA is not included. Revised Section ES.3 to provide this information for the BHHRA (i.e., first paragraph of Section ES.3).

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6	Executive Summary ES.3	Specific	<i>ES-10 to ES-11</i>	In the third paragraph of Section ES.3, the term “ecological COCs” is used twice. The BERA identified “preliminary COCs”. Update the one use of “preliminary COCs” (sixth sentence of the third paragraph) and two uses of “ecological COCs” (seventh and eighth sentences of the third paragraph) to instead use “preliminary ecological COCs” to remain consistent with the BERA while still differentiating ecological conclusions from human health. In addition, the fourth paragraph of Section ES.3 describes the identification of ecological risk drivers in the BERA, but again uses “ecological COCs”. Replace “ecological COCs” in the first sentence of Section ES.3 with “ecological risk drivers”.
<i>Section 1</i>				
1	Section 1.1	Specific and General	<i>1</i>	The first sentence in the second paragraph of Section 1.1 specifically references “this Draft” RI Report. Once the RI Report is final, remove this reference to draft and ensure that all references to draft are removed from the document as relevant and appropriate.
2	Section 1.2.2	Specific	<i>3</i>	The last sentence in the final paragraph of Section 1.2.2 implies a phased remediation strategy to address risks in the LPR. As other prior comments on the RI Report have noted (see prior comment #6 from the comments on the Executive Summary submitted by EPA on December 17, 2018), the performance of a source control interim remedy does not change the fundamental objective of the RI to document impacts to and facilitate final, risk-based remediation of the entire 17.4-mile LPR. Reword this sentence to read “The knowledge gained provides a basis for crafting remediation strategies aimed at mitigating contaminant impacts and ultimately achieving CERCLA-compliant risk-based remedial goals protective of human health and ecological receptors.”
<i>Section 2</i>				
1	Section 2.2.1	Specific	<i>10</i>	In the fourth sentence of Section 2.2.1, it is noted that surface sediments were part of the investigations performed between 1999 and 2001. Because this is the first opportunity, and to establish consistency throughout the document, specifically define surface sediments for the LPR as being the 0 to 6-inch interval (or 0 to 15 centimeters in particular contexts, with reference to what those contexts are).
2	Section 2.4.1	Specific	<i>10</i>	In the fourth sentence of the first paragraph of Section 2.4.1, Section 4 and Appendix A are referenced as discussing the application of bathymetry data to specific analyses. Include Appendix M, Attachment B in this list of other locations within the RI where bathymetry data are discussed in the application to specific analyses.
3	Section 2.4.1	Specific	<i>11</i>	In the first sentence of the second paragraph of Section 2.4.1, it is noted that “other methods” were used to characterize properties for surface and subsurface sediments. Because this is the first opportunity, and to establish consistency throughout the document, specifically define subsurface sediments for the LPR as being sediments deeper than 6 inches (or deeper than 15 centimeters in particular contexts, with reference to what those contexts are).

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No.	Section	General or Specific	Page No. *	Comment
4	Table 2-5	Specific	N/A	Table 2-5 does not include the 2013 single beam survey that is reflected in Table 1 of Appendix A. Include this survey in Table 2-5 for consistency.
<i>Section 4</i>				
1	Section 4.1	Specific	29	In the sixth sub-bullet under Bathymetry in Section 4.1, the final sentence indicates “the names of the various categories are the same as before for consistency with the rest of the reaches”. It is not clear what “same as before” is intended to mean (i.e., this could imply some other discussion even external to the RI), however, it seems likely it means the same as the categories that are described above in this same sub-bullet. Assuming this to be the case, rewrite this sentence to read “Though the single-beam data included 2004, the names of the various categories are the same as those described above in this sub-bullet for consistency with the rest of the reaches.”
2	Figures 4.2.5-19b, e, f, g, h, and l	Specific	N/A	Prior comment #52 on Sections 1 through 4 (from the comments on Sections 1 through 4 submitted by EPA on September 19, 2018) requested that a note be added to the 4.2.5-19 series of figures (and any other figures presenting data from the RM 10.9 TCRA area) stating that the TCRA was substantially completed in 2014. While this edit was made in most cases, it was not made in some instances. Include the relevant note for Figures 4.2.5-19b, e, f, g, h, and l.
<i>Section 5</i>				
1	Section 5	General	N/A	Prior comments on Section 5 (see comments on Section 5 submitted by EPA on September 20, 2018) have reflected that information in this section must be consistent with the final BERA. The BERA is not currently final and is being reviewed and finalized in parallel with the review and finalization of the RI Report. While Section 5 is consistent with the current version of the BERA, and it is not anticipated that significant changes will be made to the BERA before it is considered final, ensure that language in Section 5 remains consistent with the BERA as the RI Report is finalized and the BERA is finalized in parallel.
3	Table 5-2	Specific	N/A	Table 5-2 indicates that the acreage of mudflats in Reach 2 (RM 2 – RM 4) is approximately 211 acres. This appears erroneous, and it further appears that the actual acreage should be roughly 17 to 20 acres. Verify the acreage of mudflats for Reach 2 in Table 5-2 and update the value accordingly.
<i>Section 6</i>				
1	Section 6.1	Specific	112	Footnote 127 refers to Appendix P, the bioaccumulation model. Appendix P is not currently available and will be developed and finalized at a later date. Update footnote 127 to read “The uptake pathways of dissolved and sorbed contaminant phases in the LPR foodweb will be described in Appendix P (summary of the bioaccumulation model), which will be developed and finalized at a later date in coordination with EPA”.

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No.	Section	General or Specific	Page No. *	Comment
2	Section 6.2	Specific	117	The parenthetical at the end of the final sentence in Section 6.2 currently reads "..., for reversibly sorbed contaminant". Change this to "..., for reversibly sorbed contaminants" (plural) or "..., for a reversibly sorbed contaminant".
3	Section 6.2.4	Specific	125	In the first bullet of the fifth paragraph of Section 6.2.4, the text currently reads "..., a steep concentration between the parent bed and the overlying fluff layer,...". Change this to read "..., a steep concentration gradient between the parent bed and the overlying fluff layer,...".
4	Section 6.3.2	Specific	132	Fix the spelling of "adjacent" in the fifth sentence in the fourth paragraph of Section 6.3.2.
<i>Section 7</i>				
1	Section 7.1	Specific	139	The final sentence of Section 7.1 indicates that additional details on the bioaccumulation model will be provided in Appendix P, which is not currently available and will be developed and finalized at a later date. Add a parenthetical to the end of the final sentence of Section 7.1 that reads "(Appendix P, a summary of the bioaccumulation model, will be developed and finalized at a later date in coordination with EPA)".
2	Section 7.2.3.2	Specific	145	<p>Section 7.2.3.2 was edited in response to prior comment #5 on Section 7 (from the comments on Section 5 submitted by EPA on December 17, 2018). However, in the current version of the RI Report, several values have been changed relative to the prior version of the document, including the following:</p> <ul style="list-style-type: none"> • The predicted mean decline in 2,3,7,8-TCDD concentration above RM 8 (fourth sentence) was changed from 21% to 25% • The simulated RM 0 to RM 8 mean surface concentration increase for 2,3,7,8-TCDD (fifth sentence) was changed from 89% of the WY1996 initial condition to 86% of the WY1996 initial condition • The predicted increase in mean surface concentration for 2,3,7,8-TCDD from RM 8 to RM 14.7 (fifth sentence) was changed from 12% above the WY1996 initial condition to 8% above the WY1996 initial condition <p>Other values in Section 7.2.3.1 have also been changed, but to a minor degree that suggests simple rounding issues. The altered values in Section 7.2.3.2 may be correct, but the magnitude of change for these values does not suggest simple rounding issues. Provide clarification as to why the values have changed.</p>
<i>Section 9</i>				
1	Section 9	General	N/A	Section 9 is intended to be a summary of the BERA, but this section has not yet been developed, pending EPA's separate and parallel review and approval of the BERA. Note that Section 9 of the RI Report will be reviewed by EPA once completed.
<i>Section 10</i>				

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No.	Section	General or Specific	Page No. *	Comment
1	Section 10	Specific	178	<p>Prior comment #4 on Section 10 (from the comments on Section 10 submitted by USACE on behalf of EPA on January 24, 2019) requested specific edits to the introductory portion of this section, some of which were not made, and other language has been added since the last version. To provide a more appropriate introductory level discussion of general and LPR-specific natural recovery processes, revise the first seven sentences of the opening paragraph to read:</p> <p>“Natural recovery of sediment proceeds by naturally occurring declines in sediment contaminant concentrations. These declines can also result in concomitant declines in contamination levels in the water column and biota tissue. Specifically, in the LPR, natural recovery is facilitated by net deposition or oscillating erosion and deposition that replaces higher concentration surface sediments with lower concentration depositing sediments. Recovery is inhibited by net erosion or oscillating erosion and deposition that exposes (and potentially mobilizes) higher contaminant concentrations and by external contaminant loadings. Erosion can inhibit natural recovery by exposing elevated sediment concentrations and transporting elevated sediment concentrations to other locations within the LPR. Natural recovery of 2,3,7,8-TCDD, total PCBs, total DDx, and mercury appears to be occurring in areas subject to net deposition; the same, however, is not true of HMW and LMW PAHs, likely due to ongoing sources (as discussed previously in Section 4). In contrast, surface (0- to 6-inch) sediment concentrations of all these contaminants appear to have increased in some of the areas subject to net erosion, and the overall average surface sediment concentrations in the lower 8 miles of the LPRSA declined very little from the mid-1990s to roughly 2010 and increased in response to the 1-in-90-year high flow produced by Hurricane Irene.”</p>
2	Section 10.1	Specific	179	<p>The following sentence was deleted from the third paragraph of Section 10.1: “Net erosion does not induce recovery in areas where sediment concentration profiles are uniform or increasing with depth.”</p> <p>Restore this sentence, as it is a true statement (and see prior comment #3 from the comments on Section 10 submitted by USACE on behalf of EPA on January 24, 2019).</p>
3	Section 10.2.1	Specific	181	<p>In the fourth sentence of the final paragraph of Section 10.2.1, change “would not” to “may not” when describing the potential to achieve long-term reductions of other contaminants (i.e., other than 2,3,7,8-TCDD) to avoid a definitive presupposition about this outcome.</p>
4	Section 10.3	Specific	184	<p>In the fifth sentence in the fourth paragraph of Section 10.3, revise the call out to Table 1 to instead be Table 10-1.</p>

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No.	Section	General or Specific	Page No. *	Comment
5	Section 10.3	Specific	184	From the prior version of Section 10.3 to the current version, the “no-measurable-difference” bathymetric difference category was renamed to the “change \leq 6 inches” category. In the fifth paragraph of Section 10.3, the older “no-measurable-difference” category is still used at least twice. Uniformly and consistently revise the name of this category to “change \leq 6 inches”.
6	Section 10.3	Specific	185	In the first sentence of the final paragraph of Section 10.3, change “means” to “suggests” to avoid a definitive presupposition about this outcome.
7	Section 10.4	Specific	186	In the first bullet under the second paragraph of Section 10.4 that begins “Locations with high sedimentation rates...”, combine the first and second sentences with a comma to eliminate the sentence fragment.
8	Section 10.4	General	186	In Section 10.3, a statement is included that none of the apparent changes in 2,3,7,8-TCDD concentration are statistically significant. Provide a statement in Section 10.4 that summarizes if the apparent changes in concentration for contaminants other than 2,3,7,8-TCDD are statistically significant.
9	Section 10.5	Specific	187	In the fourth sentence of the first paragraph of Section 10.5, change “must have” to “likely” to avoid a definitive presupposition about this outcome.
10	Section 10.5	Specific	188	In the final paragraph of Section 10.5 of the RI Report, the text indicates that “samples from net erosion locations diverge in the upper half of the distributions, with post-Irene being higher” in reference to Figure 10-21 and “locations where there was no measurable erosion or deposition look remarkably similar, suggesting no impact of Irene” in reference to Figure 10-22. The pre- and post-Irene distributions for erosional areas look similar in Figure 10-21, and the pre- and post-Irene distributions do not look “remarkably” similar in Figure 10-22 for the change \leq three inches category (based on review of the correct Figures 10-21 and 10-22 as provided separately by the CPG on May 20, 2019; see comment #19 on Section 10 below). Revise these portions of the text to read “samples from net erosion locations diverge somewhat in the upper half of the distributions, with post-Irene being generally higher” and “locations where there was no measurable erosion or deposition appear visually similar, suggesting that Irene did not have a substantial impact”.
11	Section 10.6	Specific	188	In the third sentence of the first paragraph of Section 10.6, change “...when including outliers” to “...when including or excluding potential outliers”, as the factors that may have influenced concentration patterns would apply to the entire dataset. In addition, add a final sentence to the first paragraph of Section 10.6 that reads “As a result, using existing biota tissue data to infer current recovery rates associated with changing exposures to contaminated sediments is highly uncertain.”
12	Section 10.6	Specific	189	The second paragraph of Section 10.6 references both 2000 and 2000/2001 data for biota tissue. Confirm whether the relevant data are 2000 or 2000/2001 and update the text accordingly.

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No.	Section	General or Specific	Page No. *	Comment
13	Section 10.6	Specific	<i>190 to 191</i>	The seventh paragraph of Section 10.6 introduces three samples collected in 1999 that were identified as “potentially suspect”. Include further information that describes specifically which samples these are and why they were identified as “potentially suspect”.
14	Section 10.6	Specific	<i>191</i>	In the eighth paragraph of Section 10.6, explicitly state that Table 10-4 provides percentage changes in concentration without the exclusion of potential outliers.
15	Section 10.6	Specific	<i>192</i>	In the mummichog bullet under the tenth paragraph of Section 10.6, replace “meaning” with “suggesting”.
16	Section 10.6	General	<i>194 to 199</i>	Ensure that the correct tables are called out in Section 10.6, as it appears that several table callouts on the referenced pages are now incorrect following the addition of Table 10-2. For instance, several callouts to Table 10-3 allude to this table showing statistical differences, whereas Table 10-4 provides this information, and several callouts to Table 10-4 allude to this table showing potential outliers, whereas Table 10-5 provides this information.
17	Table 10-1	Specific	<i>N/A</i>	<p>Table 10-1 categorizes RM 1 to RM 7 areas as depositional, erosional, less than 6 inches of change, or outside of the bathymetry extent. It then subcategorizes each of those four areas based on cyclicity (cyclical, non-cyclical, or no data) based on 2007, 2008, and 2010 multi-beam bathymetry. In Table 10-1, non-cyclical combines three distinct 2007 to 2010 categories: erosion dominant (one duration was measurably erosional even if the other duration was not); deposition dominant (one duration was measurably depositional even if the other duration was not); and less than threshold (both durations were not measurably erosional or depositional). Based on the data presented in Attachment M of Appendix B, less than threshold should be the largest portion of the non-cyclical category, representing about half of its acreage. The categorization in Table 10-1 invites a comparison of cyclical and non-cyclical acreages. However, because the non-cyclical category includes all of the acreage where change in at least one duration between 2007 and 2010 is less than the threshold, hence uncertain, such a comparison could convey a distorted impression of the prevalence of cyclical versus consistently erosional or depositional areas. To avoid this impression, break out the three component categories of “not-cyclical 2007-2010” separately in Table 10-1 (i.e., replace each row currently labelled “not-cyclical 2007-2010” with three component rows).</p> <p>Also, the bottom section of Table 10-1 is confusing. If an area was not covered by 1995 and 2010 bathymetric surveys, it does not appear possible to categorize it as cyclical or not-cyclical for 2007-2010. Moreover, the text in Section 10.3 suggests that the “areas outside bathymetry extent” category corresponds to areas not covered by the 2010 survey. Provide clarification and revise the description of the treatment of bathymetric data in Section 10.3 and the information conveyed in Table 10-1 as necessary.</p>

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18	Table 10-4	Specific	<i>N/A</i>	Add a note to Table 10-4 that indicates this table provides percentage changes in concentration without the exclusion of potential outliers.
19	Figures 10-21 and 10-22	Specific	<i>N/A</i>	In Section 10.5, erosional and depositional acreages are provided based on a 3-inch difference threshold, based on the estimated uncertainty of the 2010 and October-November 2011 bathymetry surveys and consistent with the discussion in Appendix A. However, Figures 10-21 and 10-22, which are cited in Section 10.5, appear to be constructed using the 6-inch difference threshold between the two surveys. Replace Figures 10-21 and 10-22 with the correct versions that utilize the 3-inch difference threshold (i.e., the correct versions of these figures that were provided separately for review by the CPG on May 20, 2019).
20	Figures 10-24 and 10-25	Specific	<i>N/A</i>	The RM bins for PCBs and DDx for carp are reported in Figures 10-24 and 10-25 as being RM 5-8. It appears this should be RM 8-10 and RM 14-17.4, consistent with Table 10-4. Edit these figures for consistency.
<i>Section 11</i>				
1	Section 11.2	Specific	4	In the sixth paragraph of Section 11.2, the first sentence states that “changes in surface sediment contaminant concentrations between 1995 and 2010 in RM 1 to RM 7 suggest that recovery occurred in depositional areas.” Indicating that “recovery occurred” implies full recovery, which is not the case. Change this text to instead read “changes in surface sediment contaminant concentrations between 1995 and 2010 in RM 1 to RM 7 suggest that some degree of recovery occurred in depositional areas.”
2	Section 11.2	Specific	4	In the second sentence of the seventh paragraph of Section 11.2, change “means” to “suggests” to avoid a definitive presupposition about this outcome.
3	Section 11.3	Specific	5	In the first sentence of the third paragraph of Section 11.3, replace “ecological COCs” with “ecological risk drivers”.
4	Section 11.4	Specific	5	Prior comment #21 on Section 11 (from the comments on Section 11 provided by EPA on December 17, 2018) requested that modeling uncertainty specifically associated with modeling contaminant concentrations in biota be expressed in Section 11.4, and this remains lacking. Edit the first sentence of the second paragraph of Section 11.4 to read “Three elements of the RI work deserve note with regard to uncertainty: the distribution of contaminant concentrations, the numerical and bioaccumulation models developed to support our understanding of fate and transport and the effectiveness of remediation, and the risk assessments.” Edit the third sentence in the third paragraph of Section 11.4 to read “Their accuracy in predicting erosion and deposition, contaminant concentrations in biota, and risk reduction over time is limited due to the complexity of the system and data limitations, and this fact should be considered when making regulatory decisions for the LPR.”
<i>Appendix A</i>				

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No.	Section	General or Specific	Page No. *	Comment
1	Section 2	Specific	3	In the second sentence in the ninth paragraph of Section 2 in Appendix A (immediately beneath Equation 1), revise the second mention of Attachment B to be “Attachment B of Appendix M” to avoid any confusion as to where this attachment resides.
2	Figures	General	N/A	There are no longer figures associated with Appendix A. Remove the figure flysheet from the final RI Report.
<i>Appendix G</i>				
1	N/A	General	N/A	Add 4,4'-DDx to the acronym list.
2	Section 2.1	Specific	4	Section 4.2 of Appendix G was revised in response to prior comment #4 on this appendix (see comments on Appendix G submitted by EPA on December 28, 2018). That revision led to the deletion of footnote 5, which had been added based on a historical EPA comment. Rather than delete this footnote, move the footnote to Section 2.1 of Appendix G, linked (along with existing footnote 3) to the sentence that reads “Four time-weighted, composite, whole water samples were also collected at each station and analyzed for particulate organic carbon (POC), dissolved organic carbon (DOC), suspended sediment concentration (SSC), and salinity” (final paragraph of Section 2.1).
<i>Appendix M</i>				
1	N/A	General	N/A	Multiple versions of Appendix M were made available for EPA review during the current review period; please ensure that the most current version of Appendix M is incorporated into the final RI Report, and that edits made specifically to Appendix M, Attachment B have been made to the immediate prior version of the attachment.
2	Section 4.5	Specific	33	In the fourth sentence of the third paragraph of Section 4.5 in Appendix M, Attachment B, capitalize “bed” to start the sentence.
3	Figure 4-16	Specific	44	In Appendix M, Attachment B, the acreages on the vertical axis of the top and bottom panel of Figure 4-16 are an order of magnitude greater than the middle panel, although all three axes should show similar magnitudes. Check the values plotted and correct them (note the LPR is not 3,000 acres).
<i>Appendix O</i>				
1	Section 3.1	Specific	25	In the second to last sentence of the second paragraph of Section 3.1 in Appendix O (prior to the bullet list), correct the text to reflect that arithmetic averages were used for the 20-foot conditional simulation results and area-weighted averages were used for Thiessen polygons (consistent with the discussion during the May 2, 2019 project modeling conference call).